

Exhibit DDD

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Attorneys for Defendant PACIFIC GAS AND
ELECTRIC COMPANY

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PACIFIC GAS AND ELECTRIC
COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**DECLARATION OF [REDACTED]
IN SUPPORT OF RESPONSE TO FIFTH
FURTHER REQUEST FOR RESPONSES
RE DIXIE FIRE**

Judge: Hon. William Alsup

1 I, [REDACTED], hereby declare under penalty of perjury as follows:

2 1. I make this declaration based upon personal knowledge and if called as a witness I
3 could and would testify competently to the matters set forth herein.

4 2. I am a Troubleman with Pacific Gas and Electric Company ("PG&E").

5 3. Regarding Question 37, I am familiar with and have been trained on PG&E's
6 procedures related to operating on PG&E's electric distribution system, including the PG&E
7 procedure quoted in the court's question (the "PG&E Procedure"). I believe my prior testimony is
8 consistent with the PG&E Procedure.

9 4. Based on my experience and prior training, I understand the PG&E Procedure to
10 mean that if single phasing is present, a switchman or troubleman such as myself is authorized to
11 open the remaining fuses without first contacting a Distribution Operator. I do not understand the
12 PG&E Procedure as providing me with authority to open switches upstream of a blown fuse, such
13 as Switch 941, if single phasing is present. As I testified at the hearing, PG&E procedures would
14 not authorize me to open switches, such as Switch 941, without a Distribution Operator's approval
15 unless life or limb is threatened during an emergency.

16 5. Even had I understood that the PG&E Procedure gave me authority to open Switch
17 941 on the grounds that single phasing was present, I did not think it was necessary to do so. As I
18 previously testified, while I was at Cresta Dam, I inspected the Bucks Creek 1101 Line using my
19 binoculars and saw what I thought was at least one blown fuse hanging from a pole on the circuit.
20 At the time, I considered whether single phasing could be present, but I did not believe single
21 phasing to be an immediate concern based on the circumstances as I understood them to be at the
22 time. The primary concern with single phasing is damage to the end users' equipment. Only two
23 users would have been affected by single phasing on the portion of the line between Pole 17733
24 and the Cresta Dam—the Cresta Dam facility operated by PG&E and the equipment in and around
25 the tunnel at the Cresta Dam. I believed that neither customer's equipment was at risk of being
26 damaged. I understood that Cresta Dam was running on a backup generator at that time and would
27 not have experienced any negative effects from single phasing, had it been taking place. Based on
28

1 my experience responding to a prior outage in this area that involved a blown fuse at Pole 17733, I
2 believed the tunnel's equipment would not be damaged.

3 6. Regarding Question 38, while standing at the Cresta Dam I observed what I
4 believed was at least one blown fuse at Pole 17733. I was not able to confirm this fact or discover
5 the cause of the blown fuse until I reached the pole. Based on my experience and training, there
6 are several reasons that fuses operate which would not be cause to cut the power, such as a
7 manufacturing error in a fuse, wind slapping the wires of a line together, lightning hitting the line
8 which could potentially weaken a fuse and eventually cause it to operate, a bird hitting one of the
9 wires on a line and pushing that wire into another wire on the line temporarily, a tree limb falling
10 into and then clearing the line, or people purposefully or accidentally shooting at company
11 equipment which can cause a fuse to operate or malfunction. As set forth in my previous
12 declaration, at the time that I observed the line from the Cresta Dam using my binoculars, it
13 appeared to me that the poles and wires on the line were up and in their normal positions, and I did
14 not see any vegetation on the line, or any smoke or other indication of fire.

15 7. Regarding Question 49, at the time I was at the Cresta Dam, I had an audio-visual
16 high voltage detector, called an "AV Meter," which I could have used to test the voltage for each
17 phase of the line incoming at the Cresta Dam. I did not do so because, as explained above, even if
18 single phasing was taking place, I did not believe it would damage the end-customer's equipment,
19 so I saw no reason to test for it.

20
21 I declare under penalty of perjury that the foregoing is true and correct to the best of my
22 knowledge.

23 Executed this 15th day of November, 2021, in the City of Chico, County of
24 Butte, State of California. 